

REMARKS

Claims 1-38 are currently pending in the Application. Claims 1, 18, and 27-30 are currently amended to clarify the claimed invention as embodied in these claims, without acquiescence or prejudice to pursue the original claims in a related application. No new matter has been added.

I. Objections to the Claims

Claims 27-30 stand rejected. More specifically, claim 27 contains a minor informality. The Office action further suggests several changes to the claim language of claims 28-30. In response, claims 27-30 are currently amended and are believed to have overcome the objections.

I. Claim Rejections Under 35 U.S.C. § 101

Claims 1-26 stand rejected under 35 U.S.C. § 101 as being allegedly directed to non-statutory subject matter.

Without acquiescence in the cited basis for rejection, claims 1 and 18 are currently amended to clarify what Applicants regard as the claimed subject matter(s) as embodied in these claims. Applicants respectfully submit that the current amendments are believed to have rendered the rejections under 35 U.S.C. § 101 moot. Applicants thus respectfully request withdrawal of the rejections and reconsideration of claims 1-26.

II. Claim Rejections Under 35 U.S.C. § 102(b)

Claims 1-7, 12-13, 15-17, 27-28 and 31-34 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,182,258 issued to Hollander et al. (hereinafter Hollander.) Applicants respectfully traverse the rejections.

A. According to the Office action, items 170 and 172 of Fig. 5 of Hollander disclose respectively the claimed limitations of “*the HDL portion*” and “*the general programming language portion*”. Applicants respectfully disagree.

Applicants first respectfully submit that “[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described” MPEP § 2131 (emphasis added.) MPEP further mandates that “[t]he identical invention must be shown in as complete detail as is contained in the . . . claim” and that “[t]he elements must be arranged as required by the claim” MPEP 2131 (emphasis added.)

Claim 1 recites at least the following limitations. Claims 18 and 27-30 also recite similar limitations.

handling one of the plurality of simulator requests, which is identified by and sent to the external debugger by an programming interface, with the external debugger for the simulator that is interrupted, the external debugger calling a request processing module at the simulator to process the one of the plurality of simulator requests, the plurality of simulator requests for simulation of the HDL portion;
providing continued access to the HDL portion while debugging, by using the external debugger, the general programming portion; and
(emphasis added.)

To the extent that the Office action considers Hollander’s co-verification requests and external program as respectively disclosing the claimed limitations of “simulator requests” and

“external debugger”, Applicants respectfully submit that Hollander does not disclose at least the aforementioned claimed limitations.

A. Claim 1 explicitly recites “handling one of the plurality of simulator requests, which is identified by and sent to the external debugger by an programming interface, with the external debugger for the simulator that is interrupted”.

Applicants first respectfully submit that Hollander does not appear to disclose “a programming interface”, much less other limitations interrelated with “the programming interface”.

B. Applicants respectfully point to col. 10, ll. 34-58 where Hollander explicitly states that the co-verification request is sent through the UNIX socket 176 to the invention, that the invention then interprets the co-verification request and executes appropriate functions, that the invention returns the results to the external program 168.

Applicants further respectfully submit that claim 1 teaches handling a simulator request with the external debugger when the simulator is interrupted, and that the simulator request is identified by and sent to the external debugger by the programming interface when the simulator is interrupted. Claim 1 further teaches that, when the simulator is not interrupted, “the simulator receives a plurality of simulator requests for simulation of the HDL portion from a programming interface”.

Hollander does not appear to show that the co-verification is sent to and is handled by the external programs by any programming interface when the simulator is interrupted. Neither does Hollander show that the simulator receives the simulator requests from the same programming

interface when the simulator is not interrupted. Rather, Hollander merely discloses that the co-verification requests are generated by the co-verification extension modules and forwarded to the invention through the UNIX socket when the external program reaches “pre-designated points at which the program interacts with the DUT”. Rather, Hollander discloses that, instead of using the same programming interface (the co-verification extension module), Hollander generally uses the “hardware-oriented verification-specific object-oriented programming language” “to construct and customize the verification tests”. Col. 4, ll. 58-60.

C. Applicants further respectfully submit that Hollander does not disclose the claimed limitation of “providing continued access to the HDL portion while debugging, by using the external debugger, the general programming portion”.

To the extent that the Office action appears to consider Hollander’s “stop on errors” and “break points” as disclosing the limitation of “interrupting a simulator”, Hollander does not appear to disclose the above claimed limitations.

As such, Applicants respectfully submit that Hollander does not disclose at least the above claimed limitations and thus may not be used to preclude the patentability of claims 1-7, 12-13, 15-17, 27-28 and 31-34 under 35 U.S.C. § 102(b) for at least the foregoing reasons.

III. Claim Rejections Under 35 U.S.C. § 103(a)

Claims 8-11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hollander in view of U.S. Patent No. 6,466,898 issued to Chan et al. (hereinafter Chan.) Applicants respectfully traverse the rejections.

Applicants respectfully submit that because the final Office action does not rely on Chan in forming the grounds for rejections of claims 1 from which claims 8-11 depend and because Hollander does not explicitly or inherently disclose all the claimed limitations of claim 1, Hollander and Chan, either alone or combined, do not disclose, teach, or suggest all the limitations of claims 8-11 and thus may not be used to preclude their patentability under 35 U.S.C. § 103(a) for at least this reason and the reasons presented in section II above.

IV. Claim Rejections Under 35 U.S.C. § 103(a)

Claim 14 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Hollander in view of Stallman et al, "Debugging with GDB: The GNU Source-Level Debugger", Jan. 2002 (hereinafter Stallman.) Applicants respectfully traverse the rejections.

Applicants respectfully submit that because the final Office action does not rely on Stallman in forming the grounds for rejections of claims 1 from which claim 14 depends and because Hollander does not explicitly or inherently disclose all the claimed limitations of claim 1, Hollander and Stallman, either alone or combined, do not disclose, teach, or suggest all the limitations of claim 14 and thus may not be used to preclude its patentability under 35 U.S.C. § 103(a) for at least this reason and the reasons presented in section II above.

V. Claim Rejections Under 35 U.S.C. § 103(a)

Claims 18-23, 25-26, 29-30, 36, and 38 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hollander in view of Chan. Applicants respectfully traverse the rejections.

Applicants respectfully submit that Hollander and Chan, either alone or combined, do not disclose, teach, or suggest at least the following claimed limitations of claim 18. Claims 29-30 also recite similar limitations.

determining whether there are one or more of the plurality of requests, which are identified by and sent to a processing module to perform the first process on the second language portion by a programming interface, waiting for the processing of the first language portion and indicating a need for the processing module to call a request processing module at the first language portion;

handling the one or more of the plurality of requests, which are identified by and sent to the processing module by the programming interface, for the processing of the first language portion by having the processing module call the request processing function at the first language portion that has been interrupted, at least one of the one or more of the plurality of requests for the processing of the first language portion;

providing continued access to the first language portion while performing the first process on the second portion, by using the processing module, the second language portion; and

(emphasis added.)

As similarly presented in subsection II above, Applicants respectfully Hollander and Chan do not disclose, teach, or suggest at least the aforementioned claimed limitations. As such, Applicants respectfully submit that Hollander and Chan do not disclose, teach, or suggest at least the aforementioned claimed limitations of claims 18-23, 25-26, 29-30, 36, and 38 and thus may not be used to preclude their patentability under 35 U.S.C. § 103(a) for at least the foregoing reasons. Claims 18-23, 25-26, 29-30, 36, and 38 are thus believed to be also allowable over Hollander and Chan.

CONCLUSION

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

Applicant(s) hereby explicitly retracts and rescinds any and all of the arguments and disclaimers presented to distinguish the prior art of record during the prosecution of all parent and related application(s)/patent(s), and respectfully requests that the Examiner re-visit the prior art that such arguments and disclaimers were made to avoid.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Vista IP Law Group's Deposit Account No. 50-1105, referencing billing number 7037682001. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Vista IP Law Group's Deposit Account No. 50-1105, referencing billing number 7037682001.

Respectfully submitted,

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